

**United States Bankruptcy Court  
Northern District of Alabama  
Southern Division**

In Re: Lawanda M Freeman  
SS# XXX-XX-1659

Debtor.

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CHAPTER 13 CASE NUMBER:  
22-00619-DSC

**MOTION TO COMPEL RESPONSE TO DISCOVERY REQUEST**

**COMES NOW** the above listed debtor, by and through the attorney of record, and requests this Honorable Court to Compel Response to Discovery Request in this case and as grounds therefore would show as follows:

1. On June 28<sup>th</sup>, 2022 Debtor filed a Request for Discovery to be used in Objection to multiple Claims of alleged Creditor LVNV Funding, LLC, copies of which is attached hereto and made a part hereof.
2. To date there has been about 400 pages of Production which has not yet been fully reviewed for completeness and **no Response to Debtor's Interrogatories as Requested for Discovery.**
3. The statutory period for the response has passed and Debtor needs this response to proceed with the Objection to Claim before this Court.

**WHEREFORE**, Debtor respectfully requests this Honorable Court to Compel the Requested Discovery ie. Fully respond to the Interrogatories and supplement if needed the Production.

/s/ MICHAEL J .ANTONIO, JR.  
MICHAEL J ANTONIO, JR.  
Attorney for Debtor

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**INTERROGATORIES**

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COMES NOW, the Debtor by and through the attorney of record, and files these interrogatories pursuant to the provisions of Rule 7033 of the *Federal Rules of Bankruptcy Procedure*, propounds the following interrogatories to the alleged Creditor, LVNV Funding, LLC for purpose of discovery or for use as evidence in this cause, or for both purposes.

- 1.) Who owns LVNV Funding, LLC?
- 2.) Who owns Resurgent Capital Services?
- 3.) Does any of LVNV Funding, LLC employees also work for Resurgent Capital Services? If so, name each and list positions held.
- 4.) What does Resurgent Capital Services do for LVNV Funding, LLC?
- 5.) Has Claim any of the objected to Claims (ie. Claim numbers 11, 12, 13, 14, 15, 16, 18, 20 and 21) been acquired from someone else? If so, for each such claim then list:
  - a.) Number of Claim?
  - b.) From whom acquired?
  - c.) When it was acquired?
  - d.) How it was transferred or assigned?
  - e.) Why it was not attached to the claim?

/s/ Michael J. Antonio, Jr.

Michael J Antonio, Jr.  
Attorney for Debtor

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**REQUEST FOR PRODUCTION**

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COMES NOW, the Debtor by and through the attorney of record, and files this request for production pursuant to the provisions of Rule 7034 of the *Federal Rules of Bankruptcy Procedure*, propounds the following Request for Production to the alleged Creditor, LVNV Funding, LLC for purpose of discovery or for use as evidence in this cause, or for both purposes.

- 1.) Produce copies of all transfers or assignments on claims acquired by LVNV Funding, LLC for each claim filed in this matter.
- 2.) Produce all documents that might be introduced in evidence in this matter.

/s/ Michael J Antonio, Jr.  
Michael J Antonio, Jr.  
Attorney for Debtor

GREYSTONE LEGAL CLINIC  
1004 - 50<sup>TH</sup> Street North  
Birmingham, Alabama 35212  
Telephone (205)591-7966

**CERTIFICATE OF SERVICE**

I hereby certify that I have served a copy of the foregoing upon the following by electronic filing through the CM/ECF system or first class US mail postage prepaid and properly addressed on this the 1st day of August, 2022.

LVNV Funding, LLC  
c/o Resurgent Capital Services  
PO Box 10587  
Greenville, SC 29603-0587

LVNV Funding, LLC  
its President or CEO  
6801 S Cimarron Road STE 424-3  
Las Vegas, NV 89113

LVNV Funding, LLC  
55 Beattie Place Ste 110  
Greenville, SC 29601

LVNV Funding, LLC  
c/o Corporation Service Company Inc  
641 South Lawrence Street  
Montgomery, AL 36104

**/s/ Michael J. Antonio, Jr.**  
Of Counsel